

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- v. -

KEITH RANIERE, CLARE BRONFMAN,
ALLISON MACK, KATHY RUSSELL,
LAUREN SALZMAN, and NANCY SALZMAN,

Defendants.

No. 18-cr-204 (NGG)

**DECLARATION OF
CLARE BRONFMAN**

CLARE BRONFMAN, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a Defendant in this action and submit this declaration in support of my Second Motion to Suppress, dated February 18, 2019. The facts contained herein are based on my personal knowledge and information accessible to me in my capacity as owner of the corporate entities discussed below.
2. I am the sole owner of Wisdom Systems, LLC ("Wisdom Systems"), which offers bookkeeping, personal assistant services, and referrals to its network of business professionals, including attorneys, accountants, and computer specialists, to individuals and companies. I am a client of Wisdom Systems, as are the multiple companies and other entities that I own, including my non-profit foundation, the Ethical Science Foundation ("ESF"). Several other individuals and companies also entrusted Wisdom Systems with their confidential documents.
3. For some time, Wisdom Systems stored its older records and client files in my home, where I also stored a variety of personal papers such as letters and journals. These business and personal documents were contained in file cabinets and folders, cardboard or plastic storage boxes, or digital media such as compact discs.

4. In late 2015, I decided to move these business and personal documents from my home to a storage unit. I hired an individual named Adrienne Stiles (who, at the time, was involved with NXIVM) to move the materials.

5. Ms. Stiles was instructed to rent the storage unit for Wisdom Systems, but in fact, she rented the unit in her own name. Wisdom Systems paid the rental fees for the storage unit through April 2018.

6. I expected that the contents of the storage unit would remain private.

7. Approximately six months after Ms. Stiles moved my materials into the storage unit, she left NXIVM.

8. In early 2018, ESF received a subpoena from the New York Department of Health. Dennis Burke of Ballard Spahr LLP represented ESF in connection with the subpoena.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 18, 2019
New York, New York


CLARE BRONFMAN